

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

IN RE: NEW ENGLAND COMPOUNDING
PHARMACY, INC. PRODUCTS LIABILITY
LITIGATION

MDL No. 2419
Master Dkt. 1:13-md-02419-FDS

THIS DOCUMENT RELATES TO:

All Actions

**PLAINTIFFS' STEERING COMMITTEE'S
NOTICE OF FILING OF PROPOSED ORDER**

At the October 14, 2015 status conference, the Court requested that the PSC submit for the Court's consideration a proposal for effectuating the Court's August 26, 2015 Order dismissing claims against entities and individuals released as part of the approved Chapter 11 Plan.

The PSC hereby gives notice of the filing of a “[Proposed] Order Regarding the Procedure For Entry of Final Judgment Dismissing Claims Against Settling Defendants in Individual Cases in this MDL Proceeding” along with a “[Sample] Notice of Judgment Dismissing Claims Against Settling Defendants Pursuant to Fed. R. Civ. P. 54(b)” attached thereto.

The PSC is available to discuss the proposal with the Clerk’s office or with the Court -- either at the next status conference or otherwise. The PSC will, of course, be happy to make any proposed changes or modifications suggested by the Court.

Respectfully submitted,

Dated: October 23, 2015

/s/ Kristen A. Johnson

Thomas M. Sobol

Kristen A. Johnson

HAGENS BERMAN SOBOL SHAPIRO LLP

55 Cambridge Parkway, Suite 301

Cambridge, MA 02142

Phone: (617) 482-3700

Fax: (617) 482-3003

tom@hbsslaw.com
kristenj@hbsslaw.com

Plaintiffs' Lead Counsel

Elizabeth J. Cabraser
Mark P. Chalos
LIEFF CABRASER HEIMANN &
BERNSTEIN, LLP
275 Battery Street, 29th Floor
San Francisco, CA 94111
Phone: (415) 956-1000
Fax: (415) 956-1008
ecabraser@lchb.com
mchalos@lchb.com

Federal/State Liaison

Marc E. Lipton
LIPTON LAW
18930 W. 10 Mile Road
Southfield, MI 48075
Phone: (248) 557-1688
Fax: (248) 557-6344
marc@liptonlawcenter.com

Kim Dougherty
JANET, JENNER & SUGGS, LLC
31 St. James Avenue, Suite 365
Boston, MA 02116
Telephone: (617) 933-1265
kdougherty@myadvocates.com

Patrick T. Fennell
CRANDALL & KATT
366 Elm Avenue, S.W.
Roanoke, Virginia 24016
Phone: (540) 342-2000
pfennell@crandalllaw.com

J. Gerard Stranch, IV
Benjamin A. Gastel
BRANSETTER, STRANCH &
JENNINGS PLLC
227 Second Avenue North
Nashville, TN 37201

Phone: (615) 254-8801
Fax: (615) 255-5419
gerards@branstetterlaw.com

Mark Zamora
ZAMORA FIRM
6 Concourse Parkway, 22nd Floor
Atlanta, GA 30328
Phone: (404) 451-7781
Fax: (404) 506-9223
mark@markzamora.com

Plaintiffs' Steering Committee

CERTIFICATE OF SERVICE

I, Kristen A. Johnson, hereby certify that I caused a copy of the foregoing to be filed electronically via the Court's electronic filing system. Those attorneys who are registered with the Court's electronic filing system may access these filings through the Court's system, and notice of these filings will be sent to these parties by operation of the Court's electronic filing system.

Dated: October 23, 2015

/s/ Kristen A. Johnson
Kristen A. Johnson, BBO # 667261